



HARVARD SCHOOL OF PUBLIC HEALTH

AUG - 9 2004

Department of Nutrition
Walter C. Willett, M.D., Dr. P.H., Chair
Fredrick John Stare Professor of
Epidemiology and Nutrition

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Willett

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August 6, 2004

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive
Room 1034
Alexandria, VA 22302

Dear Colleagues:

I'm writing in response to your invitation for comments on the Food Guidance System.

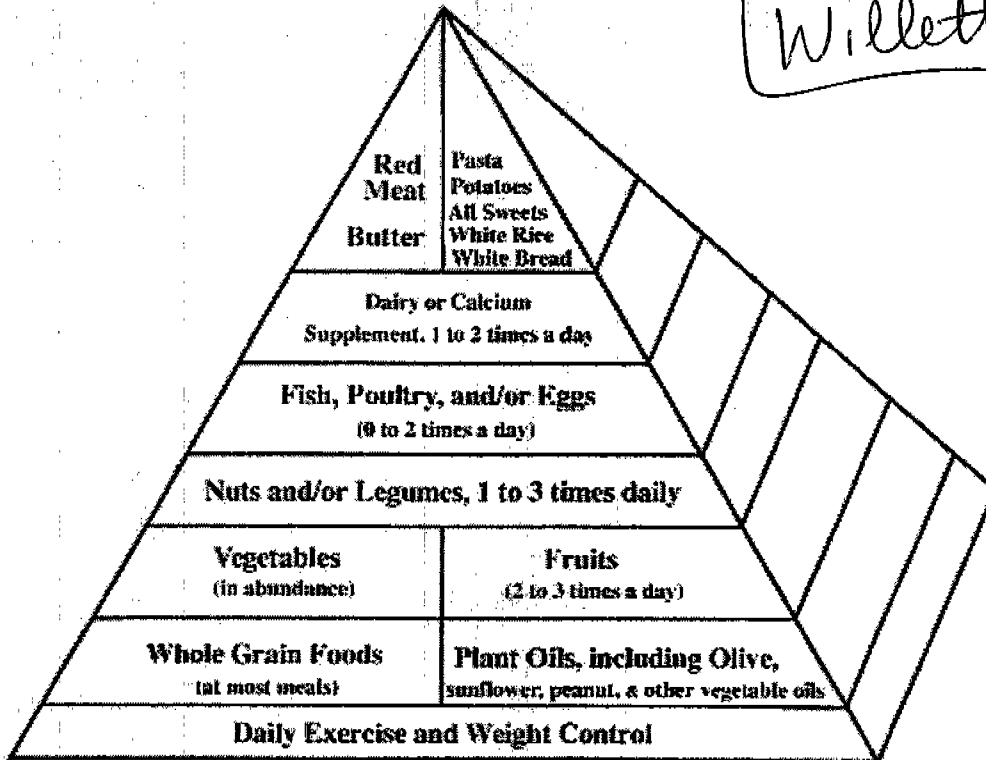
I do believe a graphic is a useful way to convey key nutritional methods, and previous USDA research has indicated that a pyramid can convey a sense of foods to be emphasized and those to be used sparingly. Unfortunately, as you are well aware, the current USDA pyramid fails to provide useful guidance, and adherence does not predict better overall health. I would therefore invite you to use the pyramid that my colleagues and I have developed. It is on page 17 of our book "Eat, Drink, and Be Healthy: The Harvard Medical School Guide to Healthy Eating" (copy enclosed). As documented in McCullough et al (Am J Clin Nutr 2002;76:1385-91), adherence to this pattern does predict better long term health.

Sincerely,

Walter Willett

Walter C. Willett, M.D., Dr. P.H.

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Sharon Testerman, M.S., R.D., L.D./N.

Winter Springs, FL

August 2, 2004

To Whom It May Concern:

Thank you for your efforts to continue to seek ways to educate the public regarding nutrition and health. Whether or not you agree with me, I appreciate all you have done, are doing, and will do in the future.

I agree that the food guide pyramid conveys variety, proportionality, and moderation with its design. The American consumer's familiarity with the food guide pyramid is good, but like with everything else it has to continually be marketed in new ways to remind the consumer that its food guidelines are important and why.

An overall guide with flexibility (i.e., some may choose meat alternatives rather than meat products to get high protein value foods) and simplicity (the graphic design of a pyramid) at a glance is most marketable and best to help motivate us each day.

Whatever controversy or food fad that may arise to try to cause imbalance in our diet and endanger our health, the basics remain... balance carbohydrate, protein, and fat intake, hydrate with sufficient water and exercise daily to maintain a healthy weight. One thing good about controversy...it reminds us why the food guide pyramid is important.

Individualization depends on so many factors: age, sex, height, current weight, ideal body weight, desired weight, family history, medical history, medications, physical activity, eating habits, eating preferences, BMI, BMR, to name a few. Energy level requirements can change daily depending on several factors. Specific information can be available for those who want the information, but for the general healthy population the food guide pyramid is a great reminder to eat a variety of healthy foods and moderate intake of "treats" in a simple to understand format to reach the most people.

The food guide pyramid is an excellent general education tool for all ages. I included a few suggestions on the attached sheet; refreshing the color scheme with new appropriate food pictures in the Whole Grain Food Group or in the Meat and Meat Alternative Group would be nice.

Thanks, again.

Sharon Testerman

Sharon Testerman, M.S., R.D., L.D./N.

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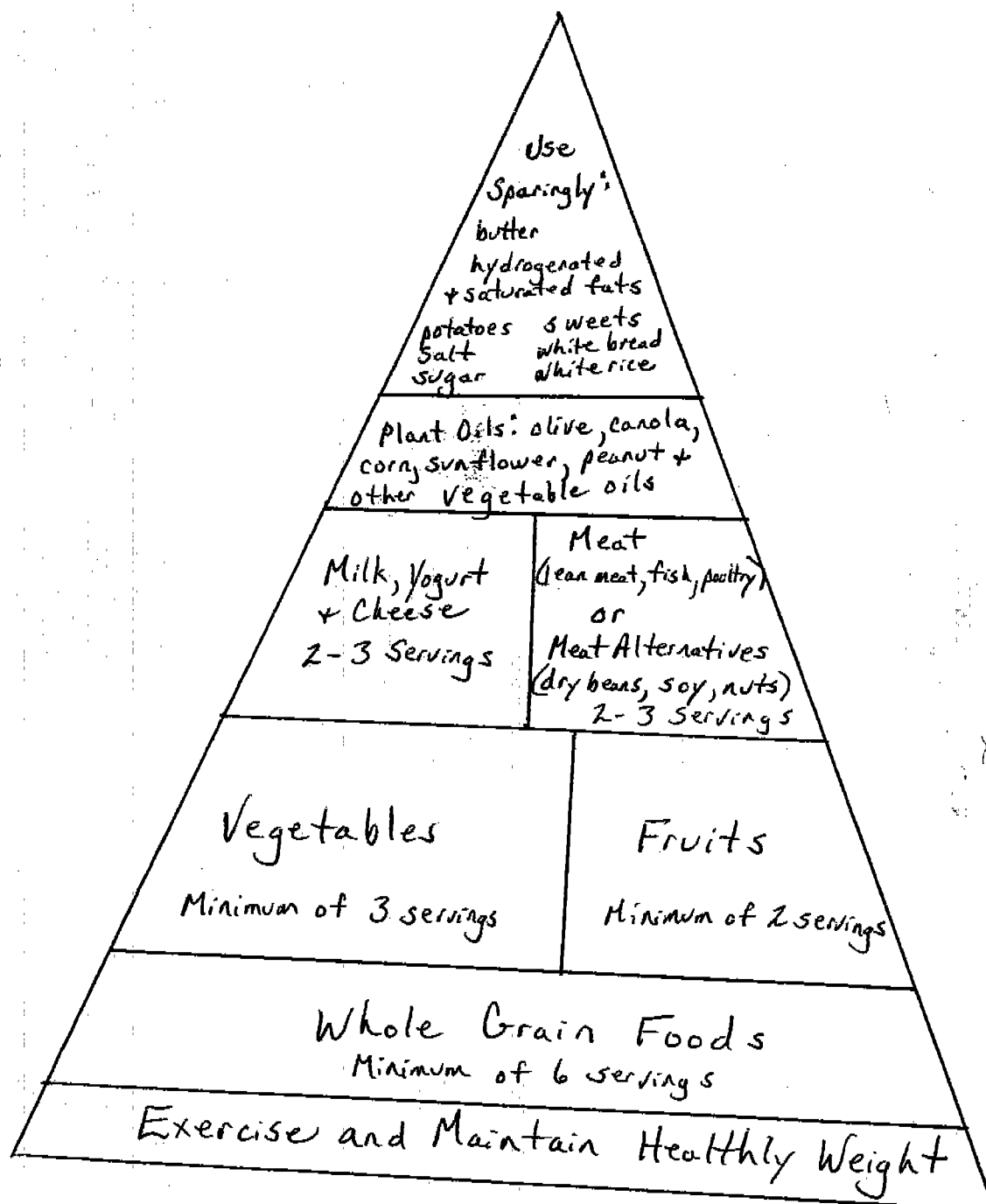
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1 of 2

Sharon Testerman, M.S., R.D., L.D./N.

Winter Springs, FL

Testerman

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* Number of Servings Depends on
Age & Physical Activity Level to
Maintain Healthy Weight

Rita G. O'Kelley

Little Rock, AR

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August 5, 2004

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

Dear FGPR Team,

It is with pleasure that I write about a subject near and dear to my heart (not to mention all the other parts of my body). Food, and not just any food, but natural, nutritious, unprocessed foods that are utilized by our bodies.

The current Food Guide Pyramid is, in my personal experience, upside down. I have done extensive reading from a myriad of sources and have tried the various beliefs, opinions, diets and food groupings.

A historical look at people in uncivilized populations far from our western culture, finds no evidence of heart disease, mental disease, tooth decay, cancer and other degenerative diseases. The cause is clearly related to their diets that are devoid of processing. They eat raw, unprocessed meats, dairy, vegetables, grains and nuts. When these people are introduced to our western culture and diet, within twenty short years they are plagued with our same health problems. This fact alone is cause to re-think our priorities and what we tell the public.

Please consider doing away with the food pyramid completely, and replacing it with a sound well-documented food guide with a list of Nourishing Traditional Foods, Compromise Foods and "Newfangled Foods" best avoided by everyone.

That list would look something like this:

Nourishing Traditional Foods:

Proteins: Fresh, organically raised meats, seafood and eggs

Fats: Fresh butter, cream from pasture-fed animals, beef, lamb, goose and duck fat, extra virgin olive oil, unrefined flax seed oil, coconut and palm oil

Dairy: Raw, whole, cultured dairy products from pasture-fed cows

Carbohydrates: Whole grain products, beans, seeds and nuts, fresh fruits and vegetables

Beverages: Filtered, high-mineral water, meat stocks and vegetable broths, lacto-fermented drinks

Condiments: Natural sea salt, raw vinegar, spices in moderation, fresh herbs, naturally fermented soy sauce, fish sauce

Compromise Foods:

Protein: Pork, fish from shallow waters, commercially raised meats, BBQ or smoked meats, additive-free bacon or sausage, battery eggs

Fats: Unrefined peanut and sesame oils; lard

Dairy: Raw, uncultured milk; pasteurized, cultured milk products; pasteurized cheeses, melted cheeses

Carbohydrates: Whole grains not treated for phytates, unbleached white flour, canned vegetables and fruits, natural sweeteners such as honey, maple syrup, sucanat and date sugar

Beverages: Wine or unpasteurized beer in moderation with meals, diluted fruit juices, herb teas

Condiments: Commercial salt, pasteurized vinegar, canned condiments

Newfangled Foods: (to be avoided)

Protein: Processed meats with additives and preservatives, commercial soy milk

Fats: All highly processed vegetable oils, margarine, tub spreads, vegetable shortenings, fat substitutes, deep fried foods, low fat products

Dairy: Pasteurized, homogenized commercial milk, ultrahigh temperature cream and milk, processed cheeses, reduced-fat milk products

Carbohydrates: Bleached and fortified white flour products, commercial dry cereals, granolas, refined sugar in all forms, irradiated fruits and vegetables, most canned products, chocolate

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Beverages: Soda pop, distilled or pasteurized alcohol products, full strength fruit juices, commercial rice and oat milks, coffee, tea and cocoa

Condiments: Commercial baking powder, MSG, artificial flavors, additives and colors, chemically produced food preservatives, aspartame

You have been entrusted with a formidable and important task. Please try to research this with an unbiased open view rather than using former government studies or materials that may possibly have been influenced by powerful lobby groups like the beef, grain and dairy industries. They have a lot at stake and it is not in their best interest to advise us against eating their highly processed and convenient fast foods. The health of our nation weighs in the balance. One does not have to look far to realize our food is killing us. We have a high incidence of obesity and disease, all related to our western diet.

Thank you for considering these thoughts and for your work.

Sincerely,

Rita O'Kelley

Rita G. O'Kelley

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Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy & Promotion

Re: U.S. Gov't Food Pyramid.

In reviewing the benefits of helping educate the public on good nutrition by using the "Food Pyramid" may I suggest you find some "Home Economics" (State of Illinois) textbooks, circa 1949.

The Pyramid I studied had a base of proteins. It was a 7 level structure. Vegetables were split into "Green" & "Yellow". Fruit split into "Fruit" & "Citrus". Carbohydrates, were defined as "Simple" & "Complex". (Simple being sugars & starches, as refined wheat, white rice, refined sugars etc. & complex being whole grains & legumes) And lastly, fats. I don't believe this list is complete, but needless to say, it's been a few years since I studied this. The breakdown coincided with specific vitamins, minerals & natural fiber sources that the body required.

Throughout my 52 years of marriage, I've followed these basics in feeding my family. As an athletic young woman, I weighed 155, lots of muscles. Now, I weigh 163, muscles are flabby & gravity has taken it's toll. My husband, who had just gotten out of a military hospital weighed 159 & now weighs 180. Neither of us have exercise regimens, other than house & garden work. Most of my husband & my health issues are strictly age (& smoking) related.

I was thrilled recently to see the Adkins Diet Pyramid, it more closely resembles the one I studied & I believe it is certainly more conducive to good diet/health, than the present USDA pyramid.

First required were foods to build tissue & muscle, then foods to supply essential vitamins & minerals, then foods to supply energy. (ie; carbohydrates & sugars) These things we touched on in elementary school health classes & more thoroughly in my 2 years of "Home Ec.) Minimum required was one of each food group per day, two each if available.

The first time I saw the USDA pyramid, I was appalled. To promote that amount of carbohydrates is horrifying. No wonder our nation is overrun with obesity. Please review & make changes to this Pyramid. Since our schools no longer seem to teach these good eating habits, the least our Government can do is to provide legitimate guidance.

Sincerely,

Margaret Brookshier

Margaret Brookshier

Ione, CA

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FARM SANCTUARY

Watkins Glen, NY
Orland, CA

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AUG - 9 2004

August 5, 2004

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
Room 1034
3101 Park Center Drive
Alexandria, VA 22302

RE: Food Guide Graphic Presentation

Dear Pyramid Reassessment Team:

I am writing on behalf of Farm Sanctuary to comment on the notice of "Proposal for Food Guide Graphic Presentation and Consumer Education Materials" published in the *Federal Register* on July 13, 2004. Farm Sanctuary is a national non-profit organization dedicated to fighting agricultural abuse of animals and promoting a vegan lifestyle.

Farm Sanctuary supports revising the Food Guide Pyramid and its technical support data to reflect the conclusions reached by a growing body of scientific research into the relationship between diet and disease. The current food guide graphic presentation and recommended daily food intake guidelines must be considered a failure. While 80 percent of Americans recognize the food pyramid, nearly two-thirds are either overweight or obese. Diet has been demonstrated to play a significant role in a number of other diseases in addition to obesity, including heart disease, cancer, diabetes and stroke/hypertension. We believe that both the content of the food guide and its promotion among consumers must be improved.

One problem associated with the current food guide graphic and food groups is that they feature animal-based foods – meat, poultry, fish, eggs and dairy products. In fact, the guides recommend a total of 4 to 6 servings each day of foods that have been consistently linked with heart disease, cancer, and other acute and chronic health problems.

A recent survey conducted by the American Institute for Cancer Research (AICR) revealed that 72 percent of Americans eat meals containing an unhealthily high proportion of meat, poultry, fish and dairy foods and not enough vegetables, fruits, whole grains and beans. A representative of AICR offered the following observation about the survey's findings: "This survey shows that Americans have got the proportions of food on their plates reversed. As a result, most are cutting themselves off from the protection afforded by the vitamins, minerals and cancer-fighting phytochemicals found in vegetables, fruits, whole grains and beans."

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The AICR recommends a diet in which a wide variety of fruits, vegetables, whole grains and beans make up at least two-thirds of meals. In their survey, however, only 27 percent of Americans said their most recent dinner meal was mostly or completely composed of plant foods. According to AICR, meals composed predominantly of plant-based foods can lower the risk for cancer, heart disease, stroke, diabetes, obesity and other diseases. In addition to AICR, plant-based diets have been endorsed by the American Dietetic Association, the American Cancer Society, the American Heart Association, the National Institutes of Health and the American Academy of Pediatrics.

Recent research has confirmed that eating a plant-based diet, combined with maintaining a healthy weight, getting regular physical activity and not smoking, can be successful in cutting the risk of cancer. Researchers at the Mayo Clinic Cancer Center analyzed data from the Iowa Women's Health Study to show that following the AICR guidelines reduced the incidence of cancer in a sample of nearly 30,000 women whose diet and lifestyle were tracked for 13 years. (The study is published in the July 7, 2004 issue of the journal, *Cancer Epidemiology, Biomarkers and Prevention*.)

Last fall, Farm Sanctuary submitted comments to the Center for Nutrition Policy and Promotion on the proposed food guide daily food intake patterns and technical support data. In those comments we recommended that the USDA replace the current "Milk Group" with a "Calcium-rich Group" and replace the current "Meat and Beans Group" with a "Beans and Protein-rich Group."

We also submitted alternative food guide graphics that have been developed to illustrate a plant-based diet. One of the alternative representations is a Plant-based Food Pyramid that consists of a conventional pyramid design with the following four tiers: Whole Grains, Cereals, and Pastas; Vegetables and Fruits; Calcium-rich Foods and Beans and Alternatives; and Omega 3 Fatty Acids, Vitamins B₁₂ and D. Other alternatives include a vegetarian food guide pyramid and rainbow, each featuring the following five food groups: Grains; Legumes, Nuts and Other Protein-rich Foods; Vegetables; Fruits; and Fats. Instead of having a separate Calcium group, these alternatives include a segment of each food group dedicated to Calcium-rich foods.

A pyramid, as currently used, is not an ideal choice for a food guide graphic for two reasons. First, pyramids aren't typically associated with food, nutrition or health. And second, people generally associate items located at the apex of a pyramid, as being more valuable or desirable than those at its base. Inverting the pyramid, however, does not seem to be a satisfactory solution. Instead, we believe it is logical to use a graphic commonly associated with food, such as a plate, to communicate the food groups and their proportion in a well-balanced diet. Therefore, we recommend reverting to a pie-chart graphic designed to represent a plate of food with sections illustrating the appropriate servings of Grains, Fruits, Vegetables, Calcium-rich Foods, and Beans and Other Protein-rich Foods.

Regardless of whether a decision is made to retain the current pyramid or switch to another graphic, it is essential that the food guide and recommended daily food intake

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patterns emphasize non-meat sources of protein and calcium. The guides should not only convey the acceptability of plant-based foods but communicate that the amount of meat, eggs and dairy must be limited in order to maintain a healthy weight and prevent disease.

While the content of the food pyramid is in need of revision, we believe an even bigger problem is inadequate promotion of healthy eating habits by the government in general, and by the USDA in particular. The USDA, whose mission includes the marketing of agriculture, is faced with an inherent conflict of interest in its effort to encourage more healthy eating. Most Americans have probably never seen an advertisement for the USDA's "Eat 5 to 9 a Day" campaign for promoting the consumption of fruits and vegetables. Yet, each day Americans are exposed to dozens of advertisements encouraging them to eat more meat and meat products. Some of these promotions are supported by the USDA and even subsidized by taxpayer dollars. Until the Center for Nutrition Policy and Promotion is moved out of the jurisdiction of the USDA, and until the USDA and the Congress stop catering to the politically powerful meat and dairy industries, it is unlikely the food guide will represent appropriate dietary choices or that the information will be adequately communicated to the public.

Thank you for providing the opportunity to comment on this important issue. We look forward to reviewing the revised food guide and related materials when they become available.

Sincerely,



Gene Bauston, President
Farm Sanctuary

AUG - 9 2004

August 4, 2004

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

Reassessment Team:

I have taught the Food Guide Pyramid message the last five years to 59 school classes in my job with the Family Nutrition Program. I visit each classroom 7 to 8 times. The students range from 3 yrs. to 14 yrs. of age. Each lesson covered a food group of the Food Guide Pyramid. Children can learn it easily enough, but I do agree with those who argue that best is usually at the top. A pie chart concept might be easier to understand.

Whatever graphic is used, it should be very simple with as little writing as possible. People who see this image on food product packages aren't going to spend a lot of time reading it. As I tell 4-Hers, when I judge their booths and banners, "If one doesn't get the general message in 10 seconds, he won't bother to keep trying." Students did recognize the Food Guide Pyramid as something they had seen before on packaging. If it is simple enough for elementary school students to understand, then the adult population should be able to get the message as well. It doesn't need to be complex for them either.

In my teaching, I always emphasize the consumption of plain old water. That isn't on the pyramid. I go to great lengths to illustrate the sugar content of soft drinks, and the cons of their consumption. Schools make soft drinks readily available, and water is a hard sell. Be sure to include water on your new graphic. One can't live without it.

We actually need a dual graphic. One side needs to show the needs of the physically active and underweight, the other showing the needs of the sedentary or overweight population. The general public, often nutritionally uneducated, needs to be made aware of the differences between the two. With the current Food Guide Pyramid, I have found that people interpret it as they want it to be. The week after I had taught about the bread, cereal, rice, grain group, one overweight first grade boy came up to me so proudly. He announced that he had 6 slices of bread last night, because he ate 3 sandwiches at once. Of course that wasn't all he had eaten that day. I asked if he had white bread. He said he did. He only heard the 11 part. He had no idea his body style probably should never have more than 6. I then had to do a little more explaining about whole grains and "good" grain products and "not so beneficial" grain products.

The national percentage of obesity isn't true in most of the classes I visit in rural Kansas communities. These students can safely ride bikes and run and play without much supervision, often in open spaces. They are not confined to small playgrounds, and don't have to worry about high traffic areas. There are a lot of sports available to them. They are burning off what they eat. The few exceptions in these classes usually come from families who are also overweight, and who have more sedentary "couch potato" lives.

I am also continually emphasizing that we have to burn up what we eat. Our new graphic needs to instill this message, as well. Students do grasp the idea enough to nag

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their parents about their habits, even if they don't immediately change their own habits. At least they know. This message may be more important than anything we eat. The new graphic needs to show it in some way.

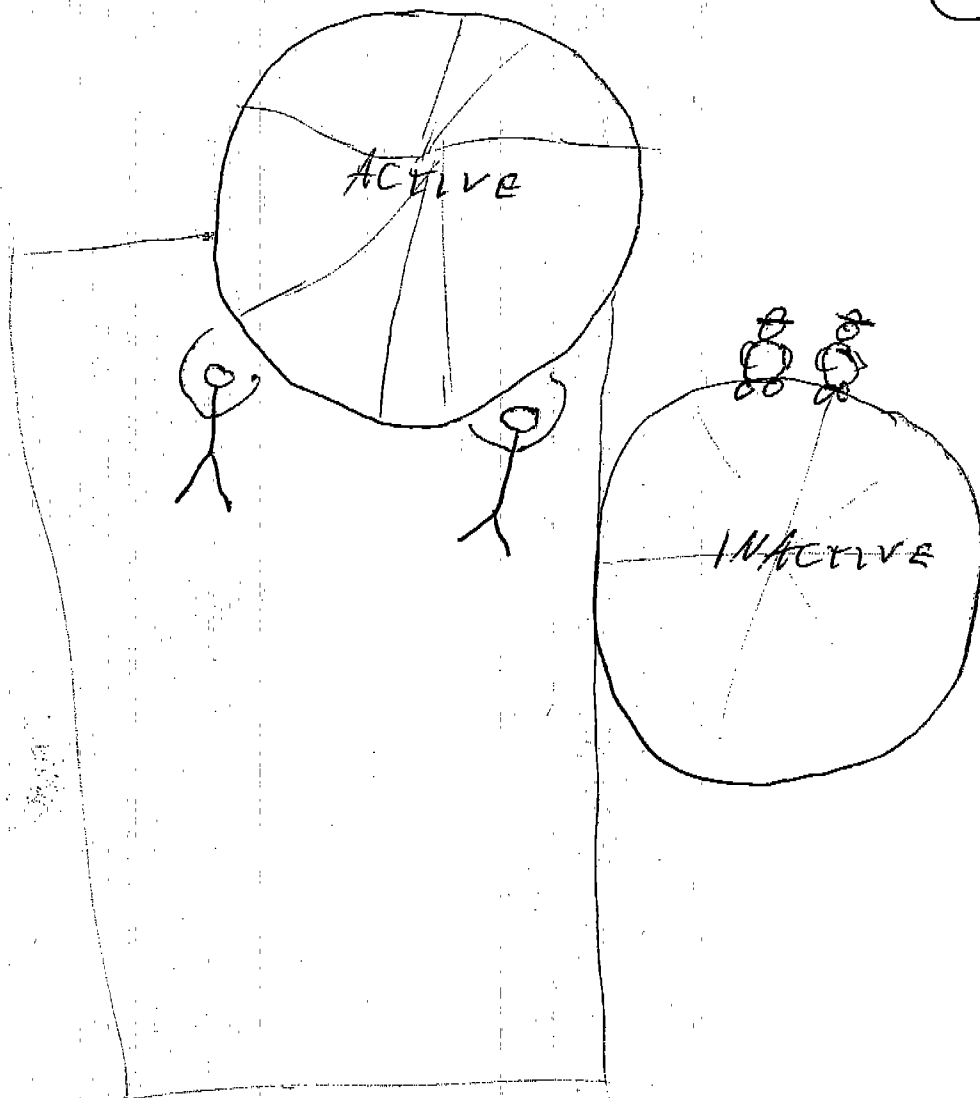
One idea for the new "picture" is to have one pie chart being used as an oversized ball in a sport, such as a volleyball or a soccer ball being used by two athletic looking tiny people. It would show food group serving suggestions for active people and be labeled ACTIVE. The other pie chart could be acting as "bleachers", with two tiny round people sitting on top of it dangling their feet over the edge, watching the game. That circle would be divided into suggested servings for overweight or inactive people and be labeled INACTIVE. People might compare the two and get the idea they could eat more on active days than on "sit around" days.

Sincerely,

Nancy Rezac

Nancy Rezac
Program Assistant
Family Nutrition Program

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Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

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August 3, 2004

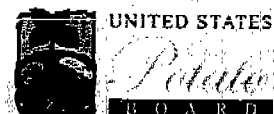
Dear Food Guide Pyramid Reassessment Team,

The U.S. Potato Board appreciates the opportunity to provide input on potential strategies for the design, implementation, and communication of the new Food Guidance System (FGS). We have targeted our suggestions for the revised Food Guidance System to address the specific goals outlined by the Center for Nutrition Policy and Promotion (CNPP) in the Federal Register Notice Dated July 13, 2004.

1. *Increase consumer awareness of the new "science-based" nutrition guidance:* The simple fact that the introduction of the new FGS will be highly publicized should be enough to raise consumer awareness of its "newness." What we feel is the most crucial component of this goal is to increase consumer's *awareness* of the *science behind* the FGS. Providing the science to back up the recommendations is important to establish the credibility of the information and, thus, consumer confidence in its validity. Consumers are becoming more discerning when it comes to diet and nutrition information. They want to know that there is legitimate research supporting dietary recommendations (1). More than that, consumers need to be assured that the new FGS is not the result of industry and/or private party persuasion, but the synthesis and analysis of the most current scientific research. Thus, we believe that the science that went into the development of the FGS should be emphasized. A document akin to the Institute of Medicine/Food and Nutrition Board's report for the *Dietary Reference Intakes* should be prepared and made available (and well-publicized) to the public and particularly to dietetics professionals who are often the "agents of change" when it comes to dietary habits.
2. *Encourage consumers to make positive changes in their food choices:* The declining quality of the American diet and the concomitant increasing prevalence of obesity are proof that despite widespread consumer awareness of the Food Guide Pyramid, the majority of Americans do not follow the dietary recommendations it illustrates (2). While no one can be sure of the specific reasons for the inability of the Food Guide Pyramid to shape America's eating behaviors, one might speculate that, when it comes to diet and nutrition, a picture is not necessarily worth a 1000 words.



United States Potato Board
Denver, CO



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Indeed, research in the area of behavior modification clearly demonstrates that simply increasing knowledge and/or awareness is not enough to induce behavior change. By the same token, the provision of nutrition/dietary *information* is insufficient to promote changes in eating habits and dietary patterns. Dietary change requires not only understanding *what needs to be done* (information) but exactly *how to do it* (simple, actionable steps) (3).

If we've learned anything from the current fad diet phenomenon it is that consumers not only want but *need* specific dietary instructions. They need to be provided with instructions on exactly *what to eat* and *when to eat it*. The popularity of the Atkins diet is probably not due to the "all you can eat bacon and burgers," but, rather, the fact that the diet is laid out week by week, day by day, meal by meal. And it's simple; Even without the menu, the Atkins' diet is exceedingly easy to follow (i.e., just don't eat carbohydrates). Research examining the efficacy of structured meal plans for weight loss confirms that providing specific dietary instructions promotes greater weight loss and improved weight loss maintenance (4). Thus, if the new FGS is to effectively encourage Americans to make positive changes in their food choices, it must not only tell them *what to do* but exactly *how to do it* using specific, easy to follow steps.

Behavior is "shaped" by reinforcements, and behavior modification theory generally supports the efficacy of positive over negative reinforcements (5). We know that Americans do not like being told what they should not or cannot eat. Similarly, telling Americans that they are *allowed* to eat certain vegetables but must *reduce their intake* of others (as is implied by the *Daily Food Intake Patterns*), is negative messaging and may confuse consumers and even discourage vegetable consumption. On the other hand, encouraging Americans to eat the vegetables they enjoy is positive and reinforcing. In focus groups conducted by the U.S. Potato Board, we found that consumers were amazed when they saw the potato nutrition label and thrilled to learn that for 100 calories and no fat, potatoes are a nutrient-dense vegetable providing 45 percent of the recommended daily value for vitamin C, 21 percent daily value for potassium, 10 percent daily value for vitamin B6, 12 percent daily value for dietary fiber, and just 9 percent of daily value for carbohydrate.

No nutrition education tool, pyramid or otherwise, will effectively change eating behavior if it does not capitalize on the factors that influence food choices. Nutrition educators and policy makers need to realize that the factors such as taste, convenience, and cost are often more likely to influence consumer's food choices than health; thus, these factors need to be incorporated into educational messages and materials (2).



United States Potato Board
Denver, CO



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Potatoes are perfectly suited to play the role of a "sample" vegetable in positive communication messages and educational materials since potatoes are:

- A very nutritious component to a well balanced diet;
- An integral part of the diet for almost every culture and ethnic group;
- One of the most significant sources of potassium, a nutrient linked to the reduction of hypertension yet one that is lacking in the diets of most Americans (6);
- Commercially available nationwide, year-round and in almost every grocery store;
- An inexpensive, fresh vegetable;
- Simple to prepare, extremely versatile, and can be eaten for breakfast, lunch or dinner;
- Able to sustain a longer shelf life than many other fresh vegetables ;
- Easy to transport and do not need special storage requirements, such as refrigeration.

3. *Educate consumers about food choices and amounts to eat.*

Learning theory tells us that people acquire new knowledge and skills more readily if they can build upon already existing knowledge and skills. Thus, CNPP should develop their educational messages in such a way that they will build on how Americans are already eating – using foods that are familiar to consumers in educational tools and messages. This approach will increase the likelihood of acceptance and adherence to the recommendations. For example, one of the current Dietary Guidelines (which will likely be "carried over" in the new FGS) encourages increased vegetable consumption. Combining vegetables that are well-liked and more frequently consumed with those that are less frequently consumed (and advocated in the *Proposed Food Consumption Patterns*) may help meet the goal of increased vegetable consumption overall, and consumption of vegetables highlighted in the *Proposed Food Consumption Patterns*. It makes sense to feature Americans' favorite vegetable, the potato, in communication examples. Suggested tips may include topping a baked potato with broccoli, cauliflower or salsa, or "bulking" up a brothy soup or garden salad with potato chunks or slices.

To convey amounts of foods to eat, visual cues should be used to clarify recommended portion sizes. When creating messages for portion sizes, we suggest using cups or ounces in descriptors but also offering visual cues that consumers understand. For instance, the serving size listed on a potato nutrition label is 5.3 ounces. This is difficult to envision until it is compared to everyday items of similar size – such as a baseball or a computer mouse. Detailed instruction on portion sizes is vital for consumers to balance caloric intake with energy expenditure.



United States Potato Board
Denver, CO

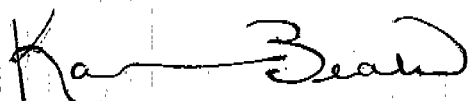


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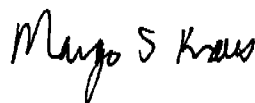
Additionally, while we agree that the CNPP *Proposed Daily Food Intake Patterns* (Table 1) are useful for providing amounts of food to be eaten at various caloric levels, we suggest it be simplified before being distributed to average consumers. These patterns have separate categories for different types of vegetables and would likely cause confusion for consumers who already fall far short of eating recommended amounts of vegetables. It would be more effective to build on the *Food Guide Pyramid* method and list recommended number of vegetable servings from *all* vegetable sources as a category. The new FGS should then go one step further and link the number of recommended vegetable (or fruit, grain, dairy, etc.) servings to particular caloric levels. This more prescriptive approach should appeal to consumers more than blanket recommendations such as, "five a day."

Thank you for your consideration of these recommendations. Please contact either one of us directly if you have any questions regarding these recommendations.

Sincerely,



Katherine Beals, Ph.D., R.D.
Consultant to the U. S. Potato Board



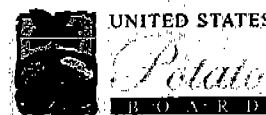
Margo Kraus, M.S., R.D.
Consultant to the U. S. Potato Board

References

- 1) International Food Information Council. Beyond the headlines: what consumers need to know about nutrition news. *Food Insight*. November/December, 2001. Available at: <http://www.ific.org>. Accessed August 3, 2004.
- 2) Goldberg JP et al. The obesity crisis: don't blame it on the pyramid. *JADA*. 2004;104:1141-1147.
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- 4) Wing RR, Jeffery RW, Burton LR, Thorson C, Sperber Nissinoff K, Baxter JE. Food provision vs. structured meal plans in the behavioral treatment of obesity. *Int J Obes*. 1996;20:56-62.
- 5) International Food Information Council. How consumers feel about food and nutrition messages. February, 2002. Available at: <http://www.ific.org>. Accessed August 3, 2004.
- 6) Panel on Dietary Reference Intakes for Electrolytes and Water, Standing Committee on the Scientific Evaluation of Dietary Reference Intakes, Food and Nutrition Board, Institute of Medicine of the National Academies. *Dietary Reference Intakes for Water, Potassium, Chloride, and Sulfate*. The National Academies Press, Washington, D.C., 2004.



United States Potato Board
Denver, CO

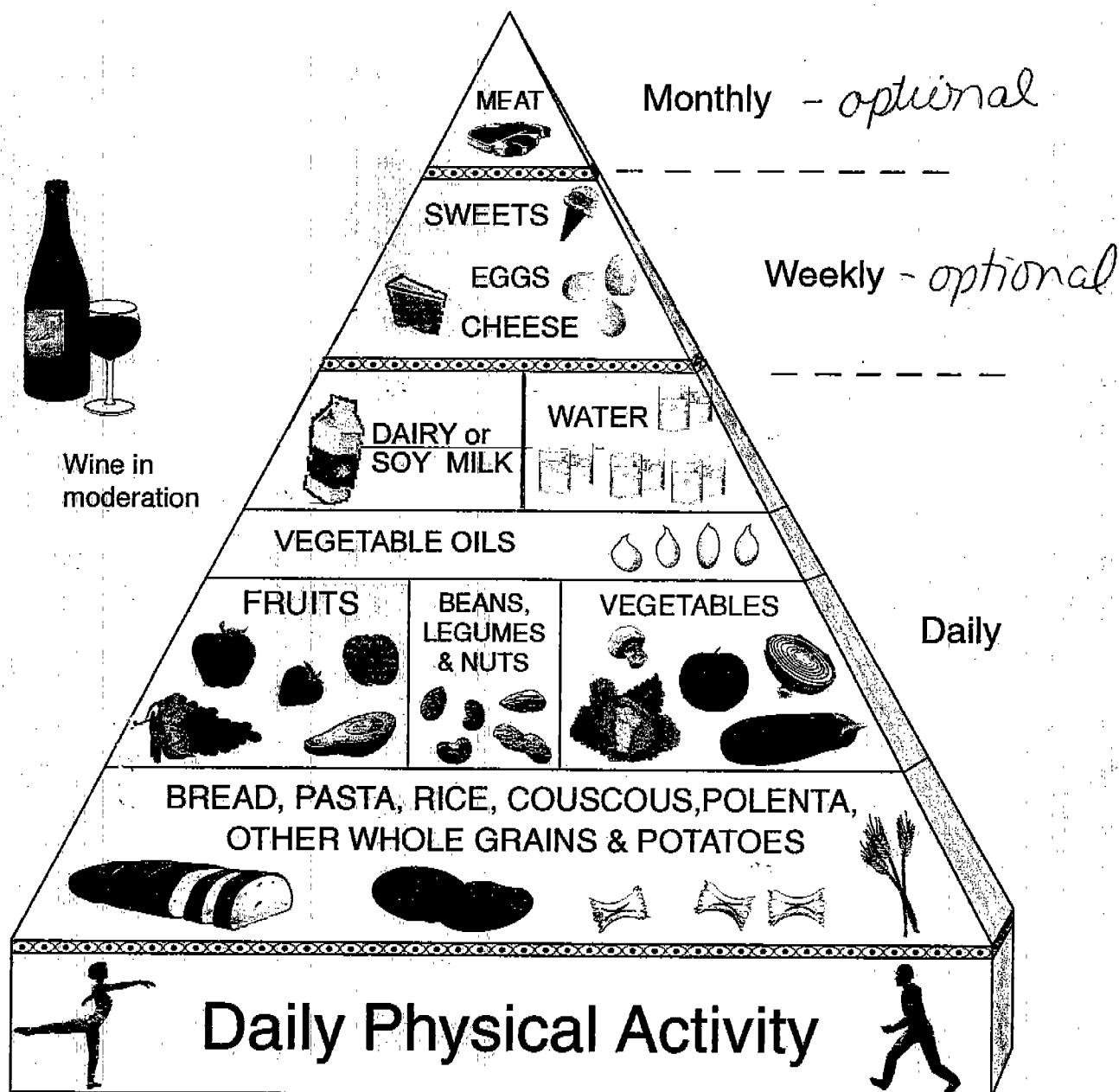


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AUG - 9 2004
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The New HEALTH - FIRST FOOD PYRAMID



Place 2022

Suggestions for updated Food Guidance System

The new graphic should : include daily exercise, emphasize importance of drinking water, contain dairy alternatives for those that are lactose intolerant and provide support for those that are vegetarian for religious or cultural reasons.

It is a known problem that Americans do not eat enough fruits and vegetables. These groups / categories should be emphasized in the new graphic. Previous graphics, including the latest pyramid, put too much attention on meat and dairy products which are high fat and overly consumed.

Educational programs in the public schools that focus on nutrition, should not be subsidized or supported in any way by industries (such as the National Dairy Association)

The focus of Future Farmers of America should put more efforts towards farming of fruits and vegetables for human consumption and less on raising animals and food for animals.

Recommendations for the USDA Food Pyramid Revision

Kovalchik, Stephanie Ann

Kovalchik

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Proposal Contents

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- I. Adequate and Moderate Energy Consumption

The goal of the USDA is to encourage Americans to adequately meet their nutrition needs, while moderating their energy intake. Food intake recommendations will be based on the work leading to the original food pyramid and the updated information outlined in the Federal Register (Department of Agriculture 2004).

Given the concern with reducing excess energy consumption, the new food presentation would be improved by explaining consumption amounts in terms of calories. In the current presentation, caloric content of food is auxiliary to the main content. Since the focus is on serving sizes, which vary from product to product and may differ from serving sizes used on food labels, individuals may be confused about how much food they are actually consuming and its relation to the recommended allowances. To alleviate this problem caloric content should be the primary description used when describing amounts of foods to be consumed. Since caloric content is available on most labels and is even offered at some restaurants, more recently in at many fast-food establishments, individuals should be able to more easily use the caloric-based food recommendations when making their dietary choices.

Despite recent recommendations from the World Health Organization for food labeling of all food types and food vendors/restaurants, there are still many occasions when individuals consume food without available caloric information (Hawkes 2004). To deal with these situations, the USDA should provide size-based caloric assessments in the "interactive personalized guidance tools" and print materials. This material should instruct individuals how to estimate the caloric content of various food types based on their physical size.

One of the difficulties of the past pyramid scheme was translating the average recommendations into an individual dietary plan. A range of amounts were given for each food group, but it was unclear where an individual's nutrition needs fell within these ranges without reading secondary material. A revised dietary guideline presentation should convey what an overall healthful diet should consist of while being personalizable and keeping to the original intent of being an adequate but moderate nutrition scheme. To accomplish these goals, the food presentation should consist of a universal "minimum" dietary recommendation rather than ranges. This should be based on the current scientifically-supported view of the minimum caloric needs for an active individual, regardless of gender, age, height, etc. In the presentation below I use a 1200 calorie daily minimum, but this made need adjustment depending on overall health and nutrition research.

This minimum portion of the diet should recommend a specific distribution across the five food groups, presented in terms of caloric content. This will ensure that the foundation of the daily diet incorporates a diversity of food types and therefore increases the likelihood of an individual, who is following the plan, to consume a variety of nutrients on a daily basis.

To make the table personalizable and more flexible additional energy requirements should be presented in an individualized format. Thus it will inform consumers that the additional calories they need will depend on their characteristics: age, gender, height, weight, and activity. A rough estimate of the additional need based on gender and body composition can be provided, but more exact calculations should be made available on secondary material through the USDA website and print materials.

To encourage food and nutrient diversity in the total diet, a recommendation should accompany the additional energy requirement. I suggest that individuals eat foods from at least 3 of the 5 groups to meet their additional caloric needs for the day.

Additional nutrient and health information, percentage daily fat, water intake, vitamin recommendations could be listed in brief statements along with the main graphical presentation. But to keep the graphic simple and understandable these statements should strive to be as comprehensive and concise as possible.

II. Presentation

In accordance with the goals of CCNP for the core graphic presentation of their dietary guidelines, I have proposed a rough sketch for a running-track themed graphic. The idea is for each individual to regard their dietary intake as a daily course, in which they have to complete specific minimum requirements in order to obtain a healthful eating goal. The minimum requirements involve caloric intake and food variety. Again, I have set the minimum requirement

at 1200 calories but this could be amended if it does not accord with expert opinion. Specific recommendations are then made for each food group based on caloric amount.

To make the guidelines more personalizable, individuals are told that the remaining energetic requirement will depend on their individual characteristics. Though they should be directed to make specific calculations through the CCNP or USDA supplementary materials available on paper or online, a rough estimate is provided. I have based this estimates on the 1200 minimum calorie diet and the Katch-McArdle formula for lean muscle mass (assuming an ideal body fat of 20% for women, and 15% for men). These estimates should be reviewed and approved by experts.

Though the additional calories are not assigned to specific food groups, a recommendation is made that these calories consist of foods from at least 3 of the 5 groups. The aim of this approach is to allow individuals to have a flexible diet, while ensuring that a variety of foods are consumed and that this consumption is not in excess of an individual's caloric needs.

Additional brief statements are listed providing recommendations for physical activity, water intake and fat consumption.

The course outlines is only a rough sketch. If such a design is implemented, it should incorporate graphics to add to clarify the meaning of each statement, i.e. a graphic background for each food group to indicate the types of foods that would fall under that category.

The overall objective of the graphic is to promote the adequate and moderate goals of the USDA's dietary guidelines, ensuring that individuals consume a variety of foods while not exceeding their daily energy requirement. By focusing on caloric content and minimum requirements, this presentation should be easier to use and personalize. The running-track theme also reiterates the importance of activity in conjunction with a healthful diet.

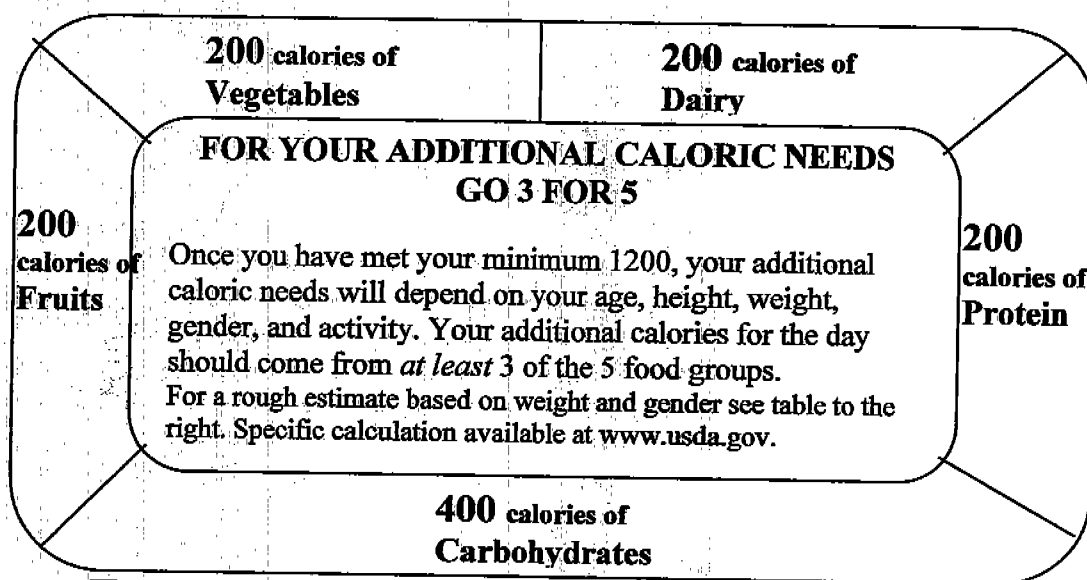
Proposed Slogan: "STAYING ON COURSE"

Graphic Presentation:

Every active individual needs a *minimum* of 1200 calories each day. To ensure you are on the right health track, complete the 1200 minimum course every day by eating the outlined calories from each food group. If you met these minimum amounts you will be on track towards a more nutrient-rich and varied diet.

Your additional caloric needs for the day will depend on your unique body and activity characteristics. An approximate estimate of your additional needs, based on weight and gender, is provided, but more specific calculations can be computed on www.usda.gov. "Stay on course" towards healthy eating by not exceeding your unique caloric needs and by meeting these caloric needs with foods from at least 3 of the 5 food groups.

The 1200+ Track to Healthful Eating and Living



Estimate of Additional Caloric Needs by Weight and Gender*

Wt (lbs)	M (calories)	W (calories)
90	300	210
100	410	310
110	520	410
120	630	510
130	740	610
140	850	710
150	960	810
160	1070	910
170	1180	1010
180	1290	1110
190	1400	1210
200	1510	1310
210	1620	1410
220	1730	1510
230	1840	1610
240	1950	1710
250	2060	1810



Less than 1/3 of your daily calories should come from fat



Blazing the track! Exercise *at least* 30 minutes a day



Drink at least 64 ounces of water a day

*Adjusted Katch-McArdle formula for a lightly active woman with 20% or man with 15% body fat.
 Additional Daily Calories_m = (11 x wt. (lbs)) - 690
 Additional Daily Calories_w = (10 x wt. (lbs)) - 690

Kovalchik For F

References

Department of Agriculture (July 2004). Federal Register, 69 (133), 42030-33.

<http://www.usda.gov/cnpp/pyramid-update/FGP%20docs/FR%20notice%20%20on%20food%20guidance%20system%207-2-04.pdf>

Hawkes, Corina (2004). Nutrition labels and health claims: the global regulatory environment. World Health Organization:

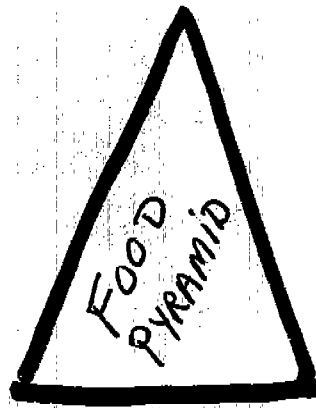
http://www.who.int/entity/dietphysicalactivity/media/en/dpa_labelling_report.pdf

Katch F, Katch V, McArdle W. (1996). Exercise Physiology: Energy, Nutrition, and Human performance, 4th Ed. Williams & Wilkins.

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OBEsITY = FULL POCKETS

Carver 1 of 1 (147)



Obesity causes enough medical problems in the U.S.A. to keep all of the doctors pockets

FULL OF MONEY!

J. Jesse Murray

Redding, CA
8-3-2004

Food Guide Pyramid Reassessment Team

USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

To Whom it May Concern,

My name is Jesse Murray and I'm writing to share my thoughts on the USDA Food Guide Pyramid. I found myself a young man (24) that was an active ex athlete over weight. I was five feet eleven inches tall and weighed 233lbs. Six years earlier I graduated high school at 150lbs. I was active, worked out three or four days a week and participated in snowboarding, wakeboarding etc. One day I saw a picture of myself at the lake and decided that I had to change my life. I decided that I would try Atkins. Now ten months later have dropped to 191lbs, witch still sounds heavy but my body fat is at 13%. I have my life back, I feel great, I am strong, have energy and my Dr. Said at my last physical that I'm in great shape, every thing looks very good! My fears about what might happen when my carbohydrates got cut have vanished. There was a time in human life when there was a call for carbohydrate dense foods but not now and not the abundance of high glycometic foods now produced. I just wanted to let you know how one American has benefitted from cutting most of the base off of the pyramid.

Please take these comments into consideration as you re-evaluate and redesign the Food Guide Pyramid.

Sincerely,

J. Jesse Murray

Murray | 1 of 1

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[Signature]

Adams 10P1

MARIE ADAMS

CORPUS CHRISTI, TX

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JP

August 4, 2004

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

Dear Reassessment Team,

I'm writing to share my thoughts on the USDA Food Guide Pyramid. My comments are based on my experience controlling carbohydrates, which have helped me to regain control of my health and my weight.

I am a 5'5" female now weighing 160 pounds and dropping. Four years ago I was approaching 45 years old and struggling with keeping my weight down. On my doctor's advice I consulted a nutritionist who outlined a diet for me based on the USDA food pyramid and some exercise guidelines which I followed well. Within two years I had gained 20 more pounds in spite of the exercise and just could not understand it. I had not been a big cereal or bread eater until this was recommended by the nutritionist.

Last year I was approaching 180 pounds on my small frame and felt desperate. I saw an article about the South Beach Diet and began that, then modifying it with the Atkins diet, uping the fat intake.

I have been able to increase my intake of fruit and whole grains including corn, beans, etc. without regaining the weight. Where I run into trouble is when I indulge in too much birthday, wedding, Christmas, Valentines, Easter, St. Patrick's Day, You name it cake, cookies, pies, candy, etc. Too much of these sweets starts a cycle of craving that is hard to break.

Please take these comments into consideration as you re-evaluate and redesign the Food Guide Pyramid. I hope my letter has been helpful.

Sincerely,

Marie Adams

Marie Adams

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

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Little 1 of 2

Dear Reassessment Team:

If you'd told me a year ago that I'd be writing a letter praising the low-carbohydrate way of life, I'd have said you were nuts. Bagels and cream cheese were my breakfast of choice. There was no way I wanted to give up all those tasty carbs: Pasta, potatoes and bread starred in most, if not all, of my meals. And then there were the sweets: Cookies, ice cream and, to a lesser extent, doughnuts, cake and pie.

Needless to say, I had quite the weight problem. At 5 feet, 10 inches tall, I believe my all-time highest weight was 306 pounds. Both my roommate and I kept saying we needed to lose weight, but we never actually did anything about it.

That changed last summer. My mother died in July at age 59, after a two-month hospital stay during which she was diagnosed with diabetes and endured quadruple bypass surgery. Suddenly, losing weight became important. I didn't want to end up like my mom.

But I knew traditional diets didn't work for me. I've never been able to follow a low-calorie, low-fat plan like Weight Watchers for much more than a couple of months. That's when I get sick of having hunger as a constant companion and decide that I'd rather eat — and enjoy what I eat — than starve.

My brother and his wife started the Atkins Nutritional Approach in August. When he had immediate success — and assured me that giving up pasta, bread and potatoes wasn't so bad — I started considering going low-carb. (Up to that point, I'd been trying to convince my Atkins-leaning roommate that we didn't need to commit to the Atkins diet as much as we needed to commit to a diet — ANY diet.) If my brother could do it, so could I.

I started Atkins on Oct. 9, 2003, two days after my 32nd birthday (and a delicious birthday cake), at a weight of 275 1/2 pounds. Even then, I was skeptical. I decided I'd stick to it for at least two weeks, the recommended period for the Induction phase. I started seeing results right away — without starving, despite smaller portion sizes — and that gave me the encouragement I needed to keep going.

As of Aug. 1, 2004, I've lost 84 1/2 pounds, and I'm still losing 1/2 to 2 pounds a week, the recommended rate. I already weigh less than I did my senior year of high school, and my blood pressure is now in the normal range without the aid of medication. (My cholesterol and blood sugar levels have stayed level. My cholesterol was already low; my blood sugar was slightly elevated.)

The best part? I've stuck to cutting carbs for almost nine months — even through the temptation-laden holidays — with very little enticement to go back to my old way of eating. I can easily walk by the box of doughnuts at work, and bypass the breadsticks at Fazoli's. I even managed to stay away from the Girl Scout cookies in February, even though they were there for the taking just steps away from my desk.

I'm not saying I'm a saint: I do cheat once in a while. But when I do allow myself a few bites of birthday cake or a spoonful of full-carb ice cream, I'm not tempted to chuck it all and start over-

loading on carbohydrates. I think it's because the things I am allowed to eat — like cheeses, steak, chicken, generous amounts of the more nutritious veggies (flavored with butter), bacon and low-carb, high fiber breads — are filling.

And I know that eventually, when I reach the pre-maintenance and lifetime maintenance phases of the eating plan, I'll be able to again enjoy limited amounts of carrots, sweet potatoes, brown rice, couscous and even the occasional baked potato.

I've finally found a diet plan that works for me — one that I can see myself sticking to for the rest of my life. I'm not hungry all the time, and I've even started to exercise regularly, as Dr. Atkins recommends. (I recently completed a 5K in 46 minutes, and I'm planning to take part in a 7-mile "climb for the cure" for the American Cancer Society in a couple of weeks.)

I never would have believed it a year ago, but cutting carbohydrates works. And if it works for a carb-junkie like me, it might just work for thousands of other overweight Americans. Please consider changing the food pyramid to encourage less carbohydrate consumption.

Sincerely,

Arlene M. Hittle

Arlene M. Hittle

Flagstaff, AZ

Hittle 2 of 2

Bolton
1 of 2

MRS. KENYON C. BOLTON AUG - 9 2004

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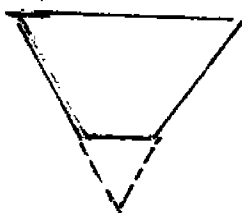
August 6, '04

Food Guide Reassessment Team
U.S.D.A. Center for Nutrition
Policy and Promotion
3101 Park Center Drive Room
Alexandria, Va. 22302. 1034

Dear Sirs:

Following is my contribution
to your contest:

Sweets and sugar, no, no.
All the good things less, yes.
You wish to be thinner?
Diminish your dinner!
And you'll be the winner -
Bravo!



(over)

Mary P. Bolton

Prouts Neck
Maine

Bolton 2 of 2

One could subdivide the
upside down pyramid
and list the beneficial categories
to one side.

Thank you!
Best wishes

Mary Bolton
(I weigh 120 pounds!)

August 4, 04

Roper/1091

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[Signature]

Food Guide Reassessment Team

USDA Center for Nutrition Policy

3101 Park Center Drive Rm 1034

Alexandria, VA 22302

Dear Sir;

Does the slogan, "Shape up, or
ship out," with an appropriate
cartoon, have value?

Thank you.

Sincerely,

Alan Roper

Standish, Me.

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Fregoso

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Frances Fregoso

La Mirada, CA

August 6, 2004

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

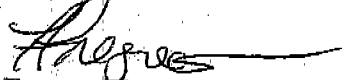
To Whom It May Concern:

My name is Frances Fregoso and I'm writing to share my thoughts on the USDA Food Guide Pyramid. My comments are based on my experience controlling carbohydrates, which have helped me to take a more conscious control of my health and my weight.

My family history shows many members suffering from diabetes I and II. My mother suffers from high blood sugar levels. I did not want to inherit my family's bad eating habits, nor their illnesses. I took control by adapting the Atkins way of healthy eating and lifestyle, by eating a controlled amount of healthy carbohydrates, including an extremely less amount of sugar than what I used to eat. It's been over a year where I dropped 20 pounds, and significantly lowered my cholesterol.

Please take these comments into consideration as you re-evaluate and redesign the Food Guide Pyramid.

Sincerely,



Frances Fregoso
Atkins lifestyle supporter